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INTERVENTION

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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

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AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

APR 02 2014

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IN THE MATTER OF THE APPLICATION
 OF JOHNSON UTILITIES, LLC
 DBA JOHNSON UTILITIES COMPANY FOR
 APPROVAL OF SALE AND TRANSFER
 OF ASSETS AND CONDITIONAL
 CANCELLATION OF ITS CERTIFICATE OF
 CONVENIENCE AND NECESSITY.

Docket No.: **WS-02987A-13-0477****APPLICATION FOR LEAVE TO
INTERVENE**

Pursuant to Arizona Administrative Code §R14-3-105, the Town of Florence, an Arizona municipal corporation, ("Florence"), hereby applies to the Arizona Corporation Commission (the "Commission"), for an order granting leave to intervene in the above captioned proceeding. In support of this Application, is respectfully requested that the Commission grant leave to intervene for the following reasons:

1. Florence, a municipal water and wastewater treatment provider holding a Designation of Assured Water Supply ("DAWS"), is currently negotiating with Johnson Utilities, LLC ("Johnson" or, "Applicant") for the purchase of substantially all the tangible and intangible assets of Applicant which are comprised by Johnson Ranch Public Water System No. 11-128 and Anthem at Merrill Ranch Public Water System No. 11-136, as well as the four wastewater plants currently operated by Johnson. Additionally, Florence seeks to purchase the assets of Johnson affiliate Southwest Environmental Utilities, LLC as part of the same transaction.

2. Based upon the transaction contemplated between Johnson and Florence, Florence will be directly and substantially affected by the proceedings in this matter.

1 3. Thousands of current and future residents of Florence will be also be substantially
2 affected by the Applicant's proposed sale of assets to Florence and the conditional cancellation
3 of its CC&N, as well as thousands of current customers of Johnson residing outside of Florence's
4 municipal boundaries.

5 4. It is reasonably anticipated that the participation of Florence in these proceedings will not
6 unnecessarily enlarge the scope of the Commission's inquiry into the Johnson application, nor
7 cause undue delay.

8 5. If leave to intervene is granted, the Town of Florence requests that all communication
9 issued in connection with the proceedings be directed to:

10 James E. Mannato
11 Florence Town Attorney
12 775 N. Main Street
13 P.O. Box 2670
14 Florence, AZ 85132
15 520-868-7557
16 james.mannato@florenceaz.gov

17 Charles Montoya
18 Florence Town Manager
19 775 N. Main Street
20 P.O. Box 2670
21 Florence, AZ 85132
22 520-868-7558
23 charles.montoya@florenceaz.gov

24 RESPECTFULLY SUBMITTED this 2nd day of April, 2014.

25 
26 James E. Mannato
27 Florence Town Attorney
28

1 Original and thirteen (13) copies filed this 2nd day of April, 2014, with:

2
3 Arizona Corporation Commission
4 Docket Control
5 1200 W. Washington Street
6 Phoenix, AZ 85007

7 A copy of the foregoing document was mailed this
8 2nd day of April, 2014 to:

9 Lyn Farmer, Chief Administrative Law Judge
10 Hearing Division
11 Arizona Corporation Commission
12 1200 W. Washington Street
13 Phoenix, AZ 85007

14 Janice Alward, Chief Counsel
15 Legal Division
16 Arizona Corporation Commission
17 1200 W. Washington Street
18 Phoenix, AZ 85007

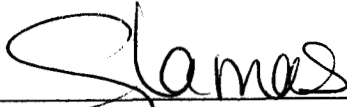
19 Steve Olea
20 Utilities Division
21 Arizona Corporation Commission
22 1200 W. Washington Street
23 Phoenix, AZ 85007

24 Jeffrey W. Crockett
25 Brownstein Hyatt Farber Schreck, LLP
26 One East Washington Street, Suite 2400
27 Phoenix, AZ 85004-2202
28 Attorney for Johnson Utilities, LLC

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2 Ryley Carlock & Applewhite
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4 Phoenix, AZ 85004

5 
6 By: Stephanie Lamas